

## PRIVACY POLICY

Bennett & Co. Financial Services Pty Ltd (ABN 69 118 309 322) respects and understands any concerns regarding the collection and privacy of your personal information. The security of our customers' personal information and the use of this information solely for the purpose that it was given to us are important and receive the highest care and attention.

In this Privacy Policy "we", "us" or "Bennett & Co. Financial Services" means Bennett & Co. Financial Services Pty Limited (ABN 69 118 309 322).

Bennett & Co. Financial Services is committed to safeguarding your personal information in accordance with the National Privacy Principles of the Privacy Act 1988. "Personal Information" for the purposes of this Policy is information about and which identifies individuals, whether that information is obtained from the relevant individual or a third party

In general we will not disclose personal information collected about you, other than for a purpose set out in this Policy, for a purpose you would reasonably expect, a purpose required by law, or a purpose otherwise disclosed to, or authorised by you. We may, in connection with particular services we offer you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in the privacy policy. In the event of any inconsistency between the provisions of this privacy policy and those additional materials, the provisions of the additional materials will apply.

Personal information collected before December 21 2001.

The National Privacy Principles came into force on 21 December 2001 but some of the Principles have application to personal information collected prior to as well as after that date. This means that for personal information we hold, which was collected prior to 21 December 2001, we will, in accordance with those particular Principles:

- Take reasonable steps to ensure that such information, if used, is accurate, complete and up-to date,
- Take reasonable steps to protect it from misuse, loss or unauthorised access or disclosure,
- Provide you with access to the information if we still use it,
- Not use any government identifier to identify you; and
- Only transfer such information overseas with your consent or as authorised by the Principles. Except in so far as this Privacy Policy further addresses the particular Principles reflected in those five matters, the remainder of this document is concerned with personal information, which is collected on or after 21 December 2001.

This Bennett & Co Financial Services Privacy Policy covers the following topics:

1. Collection of Personal Information
2. Personal Information about third parties
3. Use and Disclosure of Personal Information
4. Security of your Personal Information
5. Access to your Personal Information
6. Updating and Correcting Personal Information
7. Direct Marketing
8. Identifiers
9. Complaints Procedure
10. Changes to this Privacy Policy

### 1. Collection of personal information

Bennett & Co. Financial Services will not ordinarily collect information about you except where you provide it to us or it is provided to us with your authority.

Bennett & Co. Financial Services will only collect personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address, telephone number, email address.

In certain circumstances we may also collect personal information, which is sensitive. Sensitive information includes information about health, religious or philosophical beliefs, membership of professional or trade associations or a criminal record. Unless the collection of sensitive information is required or permitted by or under law, we will obtain your consent to the collection.

We may also listen to and/or record telephone calls to which you are a party with us for training, transaction verification and quality control purposes.

On occasions Bennett & Co. Financial Services may need to collect personal information about you from third parties. If required by law, we will obtain your consent to collect personal information from third party sources.

As a general rule Bennett & Co. Financial Services will only collect information about you that is necessary for us to provide a service to you or maintain our relationship with you. Additionally, the purposes for which we will generally collect and use your personal information will include:

- Complying with legislative and regulatory requirements,
- Considering any application you make to us,
- Performing our administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing and staff training,
- Conducting market or customer satisfaction research,
- Developing and identifying products and services that may be of interest to you;
- Informing you about products and services.

We also advise you that our Website uses "cookies". A "cookie" is a file of information that a website places on a server when you visit a site for the first time (and sometimes on subsequent visits). The use of "cookies" allows information about use of our Website to be collected by us and to provide more customised services to you on your subsequent visit to our Website. This can make navigating our Website more efficient for you. You may configure your web browser not to accept cookies, however this may mean that you are not able to use the web site.

## 2. Personal information about third parties

If at any time you supply us with personal information about another person you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information and that they may gain access to it should we hold that information.

## 3. Use and disclosure of personal information

We will not use or disclose information collected about you other than for a purpose made known to you, a purpose you would reasonably expect, a purpose required or permitted by or under law or a purpose otherwise authorised by you.

You authorise us to disclose necessary information to related companies and to any agents or contractors who provide services to us in connection with the provision of services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose in which we supply to them.

Subject to what is permitted by law, the types of third parties we may disclose your personal information to include:

- Any personal organisation who introduces you to us,
- Your referees,
- Your executor, administrator, trustee, guardian or attorney,
- Debt collecting agencies,
- Your securities and guarantors and prospective securities and guarantors,
- Government bodies and agencies,

- Any people to the extent necessary, in our view, in order to carry out any instruction you give to us. In some cases we may need to transfer your personal information outside Australia. If we believe that the overseas third party is not subject to privacy obligations equivalent to those which apply to us we will seek your consent to transfer the information, except where the National Privacy Principles do not require us to do so.

#### 4. Security of your personal information

Because data transmission over the Internet can never be guaranteed to be entirely secure, we cannot warrant the security of information you give us or that you receive from our Website during transmission.

When we have received your information, we will take all use reasonable steps to protect the personal information we hold from misuse and loss from unauthorised access, modification or disclosure.

We will take all reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used and disclosed under this policy.

#### 5. Access to your personal information

If at any time you wish to know what personal information we are holding about you, you are welcome to apply for your details by sending a letter to the attention of the Privacy Officer, Bennett & Co. Financial Services, PO Box 737, Toowong Qld 4066.

Under certain circumstances we may not be able to tell you what personal information we hold about you. This includes where:

- It would have an unreasonable impact on the privacy of another individual,
- Information relates to legal proceedings with you,
- The information would reveal a commercially sensitive decision-making process; or,
- We are prevented by law from disclosing the information, or providing access would prejudice certain investigations. We may charge a fee for accessing your personal information.

#### 6. Updating or correcting personal information

We will take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. If, at any time, you believe that personal information we hold about you is inaccurate, in complete or out of date, contact us immediately by email at [office@bennettfinancial.com.au](mailto:office@bennettfinancial.com.au) or send us a fax at (07) 3371 8265 and we will take all reasonable steps to correct it.

#### 7. Direct marketing

We will use your personal details to provide you with information about products and services, which may be of interest to you

If at any time you do not wish to receive such marketing information you have the option to ask us not to send any further information to you, and you may do so by contacting us by email at [office@bennettfinancial.com.au](mailto:office@bennettfinancial.com.au) or by telephone on 07 3876 8131.

#### 8. Identifiers

Bennett & Co. Financial Services will not adopt, as its own identifier, an identifier that has been previously assigned by a government agency or by an agent of, or a contractor to, a government agency or contract service provider for a Commonwealth contract. We will only use and disclose such identifiers for purposes required by law.

#### 9. Complaints

If you believe that the privacy of your personal information is not being adequately protected, you should contact us by letter for the attention of the Privacy Officer, Bennett & Co Financial Services, PO Box 737, Toowong Qld 4066. We will make every effort to resolve your complaint internally.

If we do not resolve your complaint to your satisfaction, you may apply to the Federal Privacy Commissioner to have your complaint investigated. For more information, please contact the Commissioner's hot line service on 1300 363 992.

#### 10. Changes to this privacy policy

This Privacy Statement may change from time to time. Our current Privacy Policy will be published on our website, [www.bennettfinancial.com.au](http://www.bennettfinancial.com.au) and we advise you to check it periodically for any changes.